IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

John K. Goodrow,

:

Plaintiff,

:

v.

Civil Action No: 3:11-cv-00020-MHL

(Consolidated)

Friedman & MacFadyen, P.A., et al.

Defendants.

.

DEFENDANTS' BRIEF IN SUPPORT OF MOTION FOR ENLARGEMENT OF PERMISSIBLE NUMBER OF PAGES FOR THEIR MOTION TO DISMISS

For the reasons set forth in their Motion for Enlargement of Permissible Number of Pages for their Motion to Dismiss, and pursuant to Local Rule 7(F)(3), Defendants urge that there is good cause to enlarge the page limit for their Motion to Dismiss, and respectfully request that the Court permit a single consolidated opening brief, exclusive of affidavits and supporting documentation, of up to 60 pages.

DATED: February 15, 2013

Respectfully Submitted,

FRIEDMAN & MACFADYEN, P.A., F&M SERVICES, L.C., JOHNIE MUNCY

By Counsel

/s/

Douglas P. Rucker, Jr. (VSB # 12776)
Andrew Biondi (VSB # 48100)
Cullen D. Seltzer (VSB #35923)
SANDS ANDERSON PC
2300 Bank of America Center
1111 East Main Street (23219)
P. O. Box 1998
Richmond, VA 23218-1998
(804) 648-1636
(804) 783-7291 (facsimile)

Email: <u>drucker@sandsanderson.com</u> Email: <u>abiondi@sandsanderson.com</u> Email: <u>cseltzer@sandsanderson.com</u>

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

Dale W. Pittman, Esq.
The Law Office of Dale W. Pittman, P.C.
112-A W. Tabb Street
Petersburg, Virginia 23803
Telephone: 804-861-6000
Facsimile: 804-861-3368
dale@pittmanlawoffice.com
Counsel for Plaintiff

John C. Petersen, Esq.
Surovell Isaacs Petersen & Levy PLC
4010 University Drive
Suite 200
Fairfax, Virginia 22030
Telephone: 703-251-5400
Facsimile: 703-591-9285
jpetersen@siplfirm.com
Counsel for Plaintiff

Kristi Cahoon Kelly, Esq.
Surovell Isaacs Peterson & Levy PLC
4010 University Drive
Suite 200
Fairfax, Virginia 22030
Telephone: 703-277-9774
Facsimile: 703-591-2149
kkelly@siplfirm.com
Counsel for Plaintiff

Leonard Anthony Bennett, Esq. Consumer Litigation Associates, P.C. 12515 Warwick Boulevard Suite 100
Newport News, Virginia 23606
Telephone: 757-930-3660
Facsimile: 757-930-3662
lenbennett@cox.net
Counsel for Plaintiff

Matthew J. Erausquin, Esq.
Consumer Litigation Associates, P.C.
1800 Diagonal Road
Suite 600
Alexandria, Virginia 22314
Telephone: 703-273-6080
Facsimile: 888-892-3512
matt@clalegal.com
Counsel for Plaintiff

Richard J. Rubin, Esq. 1300 Canyon Road Santa Fe, New Mexico 87501 Telephone: 505-983-4418 Facsimile: 505-983-2050 dickrubin@cs.com Counsel for Plaintiff

/s/

Douglas P. Rucker, Jr. (VSB # 12776)
Andrew Biondi (VSB # 48100)
Cullen D. Seltzer (VSB # 35923)
SANDS ANDERSON PC
2300 Bank of America Center
1111 East Main Street (23219)
P. O. Box 1998
Richmond, VA 23218-1998
(804) 648-1636
(804) 783-7291 (facsimile)

Email: drucker@sandsanderson.com Email: abiondi@sandsanderson.com Email: cseltzer@sandsanderson.com Counsel for Defendants